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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

CHARLES ASBERGER,

Plaintiff,

v.

CAROLYN W. COLVIN,  
Acting Commissioner of Social Security,

Defendant.

Case No. 1:14-cv-01209-RFB-PAL

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME  
(FIRST REQUEST)**

Defendant Carolyn W. Colvin, Acting Commissioner of Social Security ("Defendant") respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm by 30 days from March 2, 2015, to and including April 1, 2015.

Defendant respectfully requests this extension due to a heavy workload, including several other district court cases, despite due diligence. Defendant therefore needs additional time to properly address the issues Plaintiff raises in his Motion for Reversal and/or Remand. This request is made in good faith with no intention to unduly delay the proceedings.

1 On February 26, 2015, Counsel for Defendant conferred with Plaintiff's counsel who had no  
2 objection to this motion.

3 Respectfully submitted this 26<sup>th</sup> day of February 2015.

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5 DANIEL G. BOGDEN  
United States Attorney

6 /s/ Lynn M. Harada  
7 LYNN M. HARADA  
Special Assistant United States Attorney

8  
9 OF COUNSEL:

10 DONNA L. CALVERT  
11 Regional Chief Counsel, Region IX

12  
13 IT IS SO ORDERED:

14   
15 UNITED STATES MAGISTRATE JUDGE

16  
17 DATED: March 5, 2015

**CERTIFICATE OF SERVICE**

I, **LYNN M. HARADA**, certify that the following individual was served with a copy of the **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date and via the method of service identified below:

**CM/ECF:**

Marc V. Kalagian  
Rohlfing & Kalagian, LLP  
211 E. Ocean Blvd., Suite 420  
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Marc.Kalagian@rksslaw.com

Dated this 26<sup>th</sup> day of February 2015.

/s/ Lynn M. Harada  
**LYNN M. HARADA**  
Special Assistant United States Attorney